

# EXHIBIT 1

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**From:** Tezyan, Michael  
**Sent:** Tuesday, August 8, 2023 6:06 PM  
**To:** Park, Ryuk; Rueckheim, Mike  
**Cc:** Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]  
**Subject:** RE: Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Ryuk,

Thanks. To clarify: does Micron have an HBM3 Gen1 product, and if so, has Micron made source code available for that product?

We'll send an invite separately for 4 pm CT tomorrow.

Best,  
Michael

**Michael Tezyan**

*Associate*

**IRELL & MANELLA LLP**

1800 Avenue of the Stars, Suite 900

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**From:** Park, Ryuk <RPark@winston.com>  
**Sent:** Tuesday, August 8, 2023 4:09 PM  
**To:** Tezyan, Michael <mtezyan@irell.com>; Rueckheim, Mike <MRueckheim@winston.com>  
**Cc:** Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>  
**Subject:** RE: Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Michael,

We are available between 4-5 pm CT tomorrow. Also to be clear, the [REDACTED]

Thanks,

Ryuk

**Ryuk Park**

**Of Counsel**

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**From:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>  
**Sent:** Tuesday, August 8, 2023 3:33 PM  
**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>  
**Cc:** Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com); #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>  
**Subject:** RE: Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Ryuk,

Thanks for your response, but the document production you reference below consists largely of documents that are or reflect publicly available marketing materials that do not address the specific requests. Again, please provide a date certain by which the requested documents will be produced, or provide Micron's availability for a lead/local meet and confer for today or tomorrow. Otherwise, we intend to file our motion this evening, as these repeated delays in Micron's document production continue to significantly prejudice Netlist's ability to prepare its case.

Regarding Request #5, you are mistaken that this request regarding Micron's Gen2 HBM3 products was not included in our previous emails. Please see my July 31, 2023 email below, where we asked Micron to "confirm that Micron will produce documents related to Micron's **HBM3 Gen2 products**," a request Micron ignored and continues to ignore.

Regards,  
Michael

**Michael Tezyan**

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**From:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>  
**Sent:** Tuesday, August 8, 2023 12:57 PM  
**To:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>  
**Cc:** Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com); #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>  
**Subject:** RE: Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Michael,

I already discussed these documents with Yanan during our call yesterday. As I explained on the call, we have already

[REDACTED]

Request #5 is new and was not in your previous emails. It is also overly broad as it seems to ask for any and all documents related to HBM3. Can you specify the types or categories of HBM3 documents that Netlist is seeking? We have already [REDACTED]

[REDACTED]. We have also made available for inspection [REDACTED].  
[REDACTED]. We further produced [REDACTED].

Thanks,

Ryuk

**Ryuk Park**

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**From:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>

**Sent:** Tuesday, August 8, 2023 12:29 PM

**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>

**Cc:** Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com); #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>

**Subject:** RE: Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Counsel,

This is our third attempt to address the deficiencies with Micron's document production outlined below. Please provide a date certain that Micron will produce the requested documents, or provide your availability for a lead/local meet and confer today or tomorrow. Otherwise, Netlist intends to file a motion to compel production of the requested documents today at midnight CST. A draft of the motion is attached for your reference.

Regards,  
Michael

**Michael Tezyan**

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**From:** Tezyan, Michael

**Sent:** Friday, August 4, 2023 4:11 PM

**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>

**Cc:** Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com); #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>

**Subject:** RE: Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Counsel,

Please confirm today that Micron will produce documents listed in (1)-(4) below, and that Micron will produce documents related to its HBM3 Gen2 products. Otherwise, please provide Micron's availability for a lead & local meet & confer for early next week.

Regards,  
Michael

**Michael Tezyan**

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**From:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>

**Sent:** Monday, July 31, 2023 6:13 PM

**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>

**Cc:** Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com); #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>

**Subject:** Netlist v. Micron-203 | Deficiencies Re: Micron's Document Production

Counsel,

Please confirm by August 2, 2023 that Micron will produce the following documents, which fall under the listed categories of documents that Netlist has been requesting since November 10, 2022:

1. Documents related to improvements in power efficiency that is attributable to on-module voltage regulation on Micron's DDR5 DIMMs. RFPs #48, 53.
2. Documents related to Micron's decision to implement on-module power management on Micron's DDR5 DIMMs, including the underlying analyses, simulations and factual data regarding its adoption of VR-on-DIMM and support for adoption of VR-on-DIMM at JEDEC. RFPs #64, 109, 115.
3. Documents related to Micron's decisions to use different interconnect structures in HBM2E and HBM3 (1st and 2nd Generations), including alternatives considered, modelings performed, references consulted, and the reasons for changing the TSV interconnect structures. RFPs #68, 70, 71, 117.
4. Documents related to any comparisons of the interconnect structures of Micron's HBM products to the HBM products of its competitors, namely, SK hynix and Samsung. RFPs #68, 70, 71, 117.

Additionally, please confirm that Micron will produce documents related to Micron's HBM3 Gen2 products, which are mentioned in this July 26, 2023 press release: <https://investors.micron.com/news-releases/news-release-details/micron-delivers-industrys-fastest-highest-capacity-hbm-advance>. As Micron has long been aware, HBM3 products are expressly accused of infringement in this case.

Regards,  
Michael

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